

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY **DEPARTMENT OF SOCIAL SERVICES**

EDMUND G. BROWN JR. GOVERNOR

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov

January 10, 2018

Juliet Webb, Director Tulare County Health & Human Services Agency 5957 South Mooney Blvd. Visalia, CA 93277

Dear Ms. Webb:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of September 2017. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans.

If you need technical assistance in the development of your CAP, please feel free to contact Claudia Cabrera at (916) 654-1047. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Lee Macias

LEE MACIAS, Manager
Civil Rights Unit
Family Empowerment and Engagement Division

Enclosure

c: Ashley Loftis, Civil Rights Coordinator

Kim McCoy Wade, Chief CalFresh Policy Bureau

Carlos Ocampo, Chief Field Operations Bureau

Tami Gutierrez, Chief CalFresh Management Operations Section

Paul Gardes CalFresh Policy Bureau

Jacqueline Hom State Refugee Coordinator

Joe Torres, Office of Civil Rights USDA Food and Nutrition Services Supplemental Nutrition Assistance Program (SNAP) Western Region

Andrew Riesenberg
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Kevin Aslanian Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

CIVIL RIGHTS COMPLIANCE REVIEW REPORT FOR Tulare County Health & Human Services

Conducted on September 5-8, 2017

California Department of Social Services

Family Engagement and Empowerment Division

Civil Rights Unit

744 P Street, M.S. 8-16-70

Sacramento, CA 95814

(916) 654-2107

Reviewer: Claudia Cabrera

TABLE OF CONTENTS

- I. INTRODUCTION
- II. SUMMARY OF METHODOLOGY
- III. DISSEMINATION OF INFORMATION
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE
 NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS
- VII. STAFF DEVELOPMENT AND TRAINING
- VIII. DISCRIMINATION COMPLAINT PROCEDURES
- IX. VENDOR CONTRACTS
- X. CALL CENTER EVALUATION
- XI. COMMUNITY INPUT
- XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL
- XIII. CONCLUSION

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the Tulare County Health & Human Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on September 5-8, 2017. An exit interview was held on September 8, 2017, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
TulareWORKs Visalia	1845 N. Dinuba Blvd, Visalia	CalFRESH, CalWORKs, WTW	Spanish
Noble Plaza	4025 W. Noble Ave, Visalia	IHSS	Spanish
Hyde	3500 W. Mineral King, Visalia	Children's Services	Spanish
TulareWORKs Lindsay	900 N. Sequoia, Lindsay	CalFresh	Spanish
Customer Call Center	26644 S. Mooney Blvd, Visalia	Call Center	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2017 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.

Central California Legal Services-Visalia Office 208 W. Main Street Visalia, CA 93291

Telephone: (559) 733-8770

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	6	4
Children Social Workers	5	3
Adult Program Workers	3	1
Receptionist/Screeners	3	1
Total	17	9

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	9
Non-English or limited-English	120
speakers' case files reviewed	
Languages of clients' cases	Arabic, Cambodian, Lahu,
	Spanish, Tagalog, Hmong, Ilocano,
	Cantonese, Farsi, Hebrew,
	Mandarin, Russian, Turkish
Reasonable Accommodation Cases	5

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Comments
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes		Staff can accommodate clients by flexing their hours upon request and with prior approval from management. Applications can be mailed in; clients can scan them via the kiosks located in the lobby; or they can be submitted online through the CalWIN Benefits website.
Can clients, including those with disabilities, access services when unable to go to the office?	Yes		There are several ways clients can access services and information if they are unable to go to an office. The County of Tulare website provides information regarding the services available to clients. Clients can also access the website to submit applications, check the status of their case or get benefit information. Workers can also arrange for home visits.
Does the county ensure the awareness of available services for individuals in remote areas?	Yes		Tulare County does outreach via their county website, outstationed locations such as high schools, family resource centers, family healthcare centers and community events. Staff also inform the public of services available via community and church organizations, local radio stations and newspapers.

Signage, posters, pamphlets	Yes	No	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 8/16)?	Yes		
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes		Staff indicated they distribute the PUB 13 as part of the application packet and it is explained to clients during intake and annual recertification.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes		
Is the Pub 13 available in large print (English and Spanish), CD, and Braille?	Yes		
Were the current versions of the required posters present in the lobbies?	Yes		
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	Yes		

None.

C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	08/16
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Unit to receive the most recent versions, or download the Pub 13 from the CRU website http://www.cdss.ca.gov/inforesources/Civil-Rights/Your-Rights-Under-California-Welfare-Programs.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: 1845 N. Dinuba Blvd, Visalia, CA

Facility Element	Findings	Corrective Action
Parking	There is no "unauthorized	An additional sign shall be
	parking" sign at entrance to off-	posted either in a conspicuous
	street accessible parking.	place at each entrance to an
		off-street parking facility OR
		immediately adjacent to on-site
		accessible parking and visible
		from each parking space. (CA
		T24 11B-502.8) pg.159

Facility Element	Findings	Corrective Action
		The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 159
		The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: or by telephoning" (CA T24 11B-502.8.2) pg. 159
		Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 159
Parking	The words "no parking" painted on the pavement in the access aisle are faded.	The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 166
		This notice shall be painted in white letters a min. of 12" in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg. 166
Restroom	Women's Restroom-1 st Floor The toilet protector dispenser is high at 42".	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route.
		(CA T24 11B-603.5) pg. 382

Facility Element	Findings	Corrective Action
		All operable parts, including
		coin slots, shall be 40" max.
		above the finish floor.
		(CA T24 11B-603.5) pg. 382

a. Recommendation

None.

2. Facility Location: 900 N. Sequoia, Lindsay, CA

No findings.

3. Facility Location: 4025 W. Noble Ave, Visalia, CA

Facility Element	Findings	Corrective Action
Main Entrance	Height of accessible signage is high at 60".	Visual characters shall be 40" min. above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) pg. 449

a. Recommendation

None.

4. Facility Location: 3500 W. Mineral King, Visalia, CA

No findings.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Comments
Does the county identify a client's	Yes		Tulare County uses
language need upon first contact?			Language Services Record
How?			(Form 7). Clients can self-
			identify their language needs
			on this form.
Does the county use a primary	Yes		Tulare County uses
language form?			Language Services Record
			(Form 7).
Does the client self-declare on this	Yes		
form?			
Are non-English- or limited-	Yes		
English-speaking clients provided			
bilingual services?			
After it has been determined that	Yes		Clients will either be
the client is limited-English or non-			assigned a bilingual worker
English speaking, is there a county			or staff will use Language
process for procuring an			Line, over-the-phone
interpreter?			interpreters.
Does the county have a contracted	Yes		Language Line Interpreter
language line provider, a county			Services.
interpreter list, or any other			
interpreter process?			

Question	Yes	No	Comments
Is there a delay in providing		No	
interpretive services?			
Are county interpreters certified?	Yes		Bilingual staff are tested and certified by the Tulare County Personnel Office.
Does the county have adequate interpreter services?	Yes		
Does the county allow minors to be interpreters? If so, under what circumstances?	Yes		Staff indicated that minors are allowed to be used as interpreters only in an emergency situation and for the purpose to relay important information such as new date for appointment with bilingual interpreter.
Does the county allow the client to provide his or her own interpreter?	Yes		A client can choose to use their own interpreter.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes		If the client chooses to use their own interpreter, as a best practice it is recommended that a county interpreter also be present to ensure proper translation.
Does the county use a Release of Confidentiality Information form for client-provided interpreters?	Yes		Client provided interpreters are required to sign the bottom portion of Language Services Record (Form 7) to certify confidentiality.
Does the county use the CDSS-translated forms in the clients' primary languages?	Yes		
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes		
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes		
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing,	Yes		

Question	Yes	No	Comments
speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?			
Does the county identify a client with a disability (physical, mental, or learning)?	Yes		
Does the county assist clients with self-identifying a disability?		No	
Does the county have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?		No	
Does the county offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes		
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes		Staff indicated they can assist a client by filling out forms or reading documents out loud and documenting in CalWIN case comments.
Does the county offer a screening for learning disabilities?	Yes		Currently only offered to CalWORKs WTW clients.
Is there an established process for offering a screening?	Yes		CalWORKs WTW clients are offered a learning disability screening.
Is the client identified as having a learning disability referred for an evaluation?	Yes		Once the screening has been completed, staff will refer clients to the TulareWORKs contracted evaluator for further evaluation.

Area of Findings	Corrective Actions
Effective Services	Tulare County must develop and implement a policy that
	identifies the process to ensure effective services to
	applicants and recipients who are non-English speaking or
	who have disabilities. Div. 21-115

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

How item is Documented	Adult Programs (IHSS)	CalWORKs & Employment Services	Non- Assistance CalFresh	Fraud	Children Services
Ethnic origin documentation	SOC 293, Needs Assessment Form	Application	Application	Application	IN- ERREFR, SOC158A
Method of identifying client's primary language	SOC 293, Needs Assessment Form, CMIPS Case Home page, Form 7	Language Services Record (Form 7)	CF285 Application, Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7), IN- ERREFR, Emergency Response Referral
Method of documenting client's primary language	CMIPS Case Home page, CMIPS Case Narrative	CalWIN Demographics Tab	CalWIN Demographics Tab	CalWIN Demo- graphics Tab	CWS/CMS Contact Narrative Window
Method of providing bilingual services and documentation	CMIPS Case Narrative	CalWIN Case Comments	CalWIN Case Comments	CalWIN Demo- graphics Tab	Delivered Services Log
Client provided own interpreter	Language Services Record (Form 7), CMIPS Case Narrative	Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7)

How item is Documented	Adult Programs (IHSS)	CalWORKs & Employment Services	Non- Assistance CalFresh	Fraud	Children Services
Method to inform client of potential problem using own interpreter	Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7)
Release of information to Interpreter	Questy's; Scanned Form 7 Documents	Questy's; Scanned Form 7 Documents	Questy's; Scanned Form 7 Documents	Questy's; Scanned Form 7 Documents	Questy's; Scanned Form 7 Documents
Individual's acceptance or refusal of written material offered in primary language	Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7)	Language Services Record (Form 7)
Documentation of minor used as interpreter	CMIPS Case Narrative	CalWIN Case Comments	CalWIN Case Comments	CalWIN Case Comments	Language Services Record (Form 7), Delivered Service Log
Documentation of circumstances for using minor interpreter temporarily	CMIPS Case Narrative	CalWIN Case Comments	CalWIN Case Comments	CalWIN Case Comments	Delivered Service Log
Method of identifying client's disability	CMIPS Case Narrative	CalWIN Case Comments	CalWIN Case Comments	CalWIN Case Comments	Suspected Child Abuse Report-ER, Case Transfer List
Method of documenting clients' disability (physical, mental, or learning)	CMIPS Notes History	CalWIN Case Comments	CalWIN Case Comments	CalWIN Case Comments	Civil Rights Compliance Review checklist

How item is Documented	Adult Programs (IHSS)	CalWORKs & Employment Services	Non- Assistance CalFresh	Fraud	Children Services
Method of offering a reasonable accommodation to the client with disability	CMIPS Notes History	None Found in Cases Reviewed	None Found in Cases Reviewed	None Found in Cases Reviewed	Delivered Service Log
Method of documenting clients' reasonable accommodation	CMIPS Case Narrative	CalWIN Case Comments	CalWIN Case Comments	CalWIN Case Comments	Delivered Service Log

Areas of Action	Corrective Action
Accessibility to Programs	Tulare County shall ensure that programs and activities are readily accessible to individuals with disabilities. Div. 21-111.1
Documentation of a disability	Tulare County shall ensure that case record is documented upon obtaining information that identifies an applicant/recipient as disabled. Tulare County shall document, in writing, an applicant's/recipient's request for services. Div. 21-116.3

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504, and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Comments
Are employees trained in the requirement of Section 504 and ADA?		Х	
Do employees receive continued Division 21 Training?	Х		
Do employees understand the county policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	X		
Does the county provide employees Cultural Awareness Training?	X		Staff also have access to Relias, an online Tulare county site that provides resources with topics such as information about disability and training opportunities.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	X		
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X		The IHSS program staff specifically stated that their office does a "topic of the month" that typically includes a dedicated wall with information about the cultural group that is celebrated that month.
Does the county provide training on how to identify clients with disabilities (physical, mental & learning)?	X		Included as part of the Division 21 training.
Do employees receive training on reasonable accommodation for clients with disabilities?		Х	
Do the employees understand the county policy regarding a client's right to a reasonable accommodation?	Х		

Areas of Action	Corrective Action
Cultural Awareness and Disability Training	Tulare County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups including individuals with disabilities to ensure equal delivery of services in the county's population. Div. 21-117.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Х		All staff interviewed were aware of the difference between a program, discrimination and personnel complaint.
Do the employees know who the Civil Rights Coordinator is?	Х		All staff interviewed were aware that Ashley Loftis is their Civil Rights Coordinator.
Do the employees know the location of the Civil Rights poster "Everyone is Equal (Pub 86)" with information as to how and where the clients can file a discrimination complaint?	X		All staff indicated the PUB 86 poster was located in the lobby.

Interview and review areas	Yes	No	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Х		

None.

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	10
Number of Contracts w/Assurance of Compliance Agreement	2

B. Corrective Action

Tulare County shall ensure contractors, vendors, consultants and other providers of service who receive federal or state assistance through CDSS or through agencies covered by these regulations shall comply with nondiscrimination requirements of Division 21-103.4.

X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

A. Findings from Visalia Call/Service Center site visit and interviews.

Question	Yes	No	Comments
Does the county have a Call Center/Service Center?	Х		
Is the Call Center/Service Center publically accessible to clients?		Х	

Question	Yes	No	Comments
Does the county have a Call Center/Service Center?	Х		
Does the Call Center/Service Center answer calls for the entire county, by district, or regional office?	Х		
Does the Call/Service Center have an Interactive Voice Response system?	X		
If so, does the Interactive Voice Response system have language options for all county threshold languages?	Х		
Does the Interactive Voice Response system have an option to request free interpretive services?		Х	
Is the Call/Service Center accessible to clients with a disability (hearing impaired, physical, mental, or learning)?	X		
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?	X		
Are the Call/Service Center calls monitored for quality assurance?	X		Supervisors frequently monitor the call cue and strive to maintain a short waiting period for callers. Supervisors have the capability of randomly listening in on a live call via a headset and can, if needed, help answer calls to reduce the client wait time.
Does the Call/Service Center staff provide services to client's individual case?	Х		Staff have full access to CalWIN and can take actions on a client's case.

None.

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

There was not a reply from the Advocates who were notified for this review.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Tulare County Health & Human Services, Civil Rights Compliance Plan for 2017, was received on June 6, 2017. It is approved as submitted.

XIII. CONCLUSION

The CDSS reviewer found the Tulare County Health & Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Ashley Loftis, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Tulare County Health & Human Services in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Tulare County Health & Human Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.